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United States Attorney

W. DOUGLAS SPRAGUE (CASBN 202121)  
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Attorneys for the United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
VANESSA McKNIGHT, )  
 )  
Defendant. )

Case No. CR-08-0208-WDB

**DECLARATION of SARALA NAGALA  
IN SUPPORT OF UNITED STATES'  
MOTION FOR SUMMONS**

I, Sarala Nagala, hereby declare as follows:

1. I am a Law Clerk in the United States Attorney's Office assigned to this case. I have received the following information from agents employed by the Department of Homeland Security Office of the Inspector General (DHS OIG) and from reports and other documents provided to me by the DHS OIG.

2. Hurricane Katrina made landfall in the southeastern United States on August 29, 2005. On or about September 16, 2005, McKnight contacted the Federal Emergency Management Agency (FEMA) and applied for Hurricane Katrina disaster assistance by providing the following false information: (1) her primary residence was 2725 Hamilton Street, New Orleans,

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FOR SUMMONS  
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1 Louisiana 70118; (2) her residence and personal property were damaged by Hurricane Katrina;  
2 and (3) access to her residence was restricted as a result of the disaster.

3 3. When McKnight applied for FEMA disaster assistance, she in fact resided in Oakland,  
4 California, at the Shekinah Glory Worship Center Academy (SGWCA). The proof that she  
5 resided in Oakland, California, rather than New Orleans, Louisiana, is the following: (1) a  
6 statement from Evelyn Combs, a former SGWCA employee, that McKnight moved into the  
7 SGWCA on June 15, 2005, and was living there when Hurricane Katrina hit New Orleans; (2) a  
8 County of Alameda Monthly Eligibility Report showing that, on August 2, 2005, McKnight  
9 applied for financial assistance and food stamps with Alameda County, California, and listed her  
10 SGWCA address on the application; (3) a County of Alameda Monthly Eligibility Report  
11 showing that McKnight received financial aid and food stamps at her SGWCA address for the  
12 months of July and August 2005; and (4) Social Security Administration records showing that,  
13 on August 23, 2005 (six days before Hurricane Katrina), McKnight applied for a replacement  
14 Social Security Card at the Social Security office in Oakland, California, and listed her SGWCA  
15 address on the application.

16 4. On September 17, 2005, FEMA mailed McKnight a letter that confirmed her application  
17 for Hurricane Katrina disaster assistance and asked her to certify that the information she  
18 provided to FEMA was correct. On November 24, 2005, McKnight signed and returned form  
19 90-69B, which certified as correct all the information she provided to FEMA, including her  
20 falsified New Orleans address.

21 5. McKnight subsequently received disaster relief funds from FEMA.

22 6. A summons was issued on April 7, 2008, for McKnight's last known address. The  
23 summons was not executed. This is a second summons to a different address obtained through  
24 an electronic search by Agent Rick Fuentes of DHS OIG.

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1 7. I declare under penalty of perjury that the foregoing is true and correct to the best of my  
2 knowledge and belief.

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4 Executed April 15, 2008, at Oakland, California.

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8 DATED: 4/15/08

Respectfully submitted,

9 JOSEPH P. RUSSONIELLO  
10 United States Attorney

11 /s/  
12 SARALA V. NAGALA  
13 Law Clerk  
14 United States Attorney's Office  
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9 JOSEPH P. RUSSONIELLO  
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13 Law Clerk  
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United States Attorney

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	Case No. CR-08-0208-WDB
	)	
Plaintiff,	)	
	)	
v.	)	<b>[PROPOSED] ORDER FOR SUMMONS</b>
	)	
VANESSA McKNIGHT,	)	
	)	
	)	
Defendant.	)	

Having reviewed the Declaration of Sarala V. Nagala, the Court finds that probable cause exists to believe that an offense has been committed. Accordingly, pursuant to Fed. R. Crim. P. 58(d)(3), the Clerk of the Court is directed to issue a Summons directing the defendant, Vanessa McKnight, 7510 Ney Avenue, Apartment D, Oakland, CA 94605, to appear on May 6, 2008 at 10:00 am before Magistrate Judge Wayne D. Brazil to answer the Information that has been filed by the United States Attorney.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
WAYNE D. BRAZIL  
United States Magistrate Judge

[PROPOSED] ORDER FOR SUMMONS  
CR-08-0208-WDB